

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 13 CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
TIMOTHY ULATOWSKI, M.D. FOR WAVE 13**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion filed against Timothy Ulatowski for Ethicon Wave 1, Dkt. 2060 (motion), 2065 (memorandum in support) and Dkt. 2232 (reply) and the additional arguments contained in the Daubert motion adoption filed in the Election Wave, Dkt. 7346. Plaintiffs respectfully request that the Court exclude Timothy Ulatowski's testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the following Wave 13 cases identified in Exhibit A attached hereto.

Dated: December 12, 2019

Respectfully submitted,

/s/ D. Renee Baggett

Renee Baggett, Esq.

Bryan F. Aylstock, Esq.

Aylstock, Witkin, Kreis and Overholtz, PLC

17 East Main Street, Suite 200

Pensacola, Florida 32563

(850) 202-1010

(850) 916-7449 (fax)

E-mail: rbaggett@awkolaw.com

/s/ Thomas P. Cartmell

THOMAS P. CARTMELL

Wagstaff & Cartmell LLP

4740 Grand Avenue, Suite 300

Kansas City, MO 64112

816-701-1102

Fax 816-531-2372

tcartmell@wcllp.com

EXHIBIT A

Sobie, Pamela & Raymond	12cv04789
Watts, Kathryn	16cv06001

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Thomas P. Cartmell
THOMAS P. CARTMELL
Wagstaff & Cartmell LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
816-701-1102
Fax 816-531-2372
tcartmell@wcllp.com